

KJC LAW GROUP, A.P.C.
Kevin J. Cole (SBN 321555)
9701 Wilshire Blvd., Suite 1000
Beverly Hills, CA 90212
Telephone: (310) 861-7797
e-Mail: kevin@kjclawgroup.com

TAULER SMITH, LLP
Robert Tauler (SBN 241964)
626 Wilshire Blvd., Suite 510
Los Angeles, CA 90017
Telephone: (310) 590-3927
e-Mail: rtauler@taulersmith.com

Attorneys for Plaintiff
Adelina Petrova

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ADELINA PETROVA, individually and on behalf of all others similarly situated,

Plaintiff.

V.

HOTEL COLLECTION LLC, a Florida limited liability company; and DOES 1 to 10, inclusive.

Defendants.

Case No. 2:22-cv-09231-SB-JPR

NOTICE OF SETTLEMENT

Judge: Hon. Stanley Blumenfeld, Jr.

Complaint Filed: December 20, 2022
Answer Filed: February 17, 2023
Scheduling Conf.: April 7, 2023

NOTICE OF SETTLEMENT

Pursuant to Local Rule 40-2 and this Court’s Standing Order (ECF No. 8), Plaintiff Adelina Petrova (“Plaintiff”) hereby notifies this Honorable Court that the parties have reached an agreement in principle to settle this case. The parties’ settlement provides for this case to be dismissed (i) with prejudice as to Plaintiff’s individual claims, and (ii) without prejudice as to the class allegations. *See* Judge Virginia A. Phillips, *et al.*, Rutter Group Prac. Guide Fed. Civ. Pro. Before Trial Ch. 10-C ¶ 10:790 (2022 ed.) (“Cases filed as purported class actions often settle *without having been certified* as such. The settlement agreement may provide only for the named plaintiffs’ individual claims and require the class action allegations to be dismissed without prejudice. There is no requirement of judicial approval for precertification dispositions. The reason is that absent class members generally have no notice of uncertified class actions and therefore cannot be bound or deemed to have relied thereon.”) (emphasis in original) (citing Adv. Comm. Notes to 2003 Amendments to Fed. R. Civ. P. 23).

16 The parties, through counsel, are working cooperatively to consummate a
17 long-form settlement agreement. The parties anticipate filing a stipulation for
18 dismissal within 30 days.

19 | DATED: March 10, 2023

Respectfully submitted,

KJC LAW GROUP, A.P.C.

By: /s/ Kevin J. Cole

Attorneys for Plaintiff
Adelina Petrova

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing document on all parties of record via the Court's CM/ECF system.

DATED: March 10, 2023

Respectfully submitted,

KJC LAW GROUP, A.P.C.

By: /s/ Kevin J. Cole

Attorneys for Plaintiff
Adelina Petrova